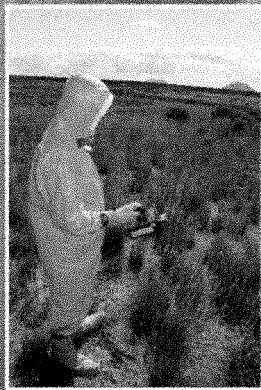


**Appendix C**  
**Long-Term Stewardship Brochure**



# *INEEL's Long-Term Stewardship Program*



## Definitions

### ***Long-Term Stewardship***

**(LTS)** - Activities necessary to ensure the protection of human health and the environment following completion of cleanup or stabilization of a site or a portion of a site. The purpose of the INEEL LTS Program is to ensure the safe and informed use of INEEL facilities and land.

**Groundwater** - Water that soaks into the ground and percolates downward through rock or soil pores until an impermeable layer stops it. Natural sources are rainfall, snowmelt, and water that seeps into the ground beneath streams, rivers and lakes. Other sources can include irrigated fields, canals, wastewater drain fields, injection wells, leaking pipes and industrial cooling ponds.

### ***Institutional Controls***

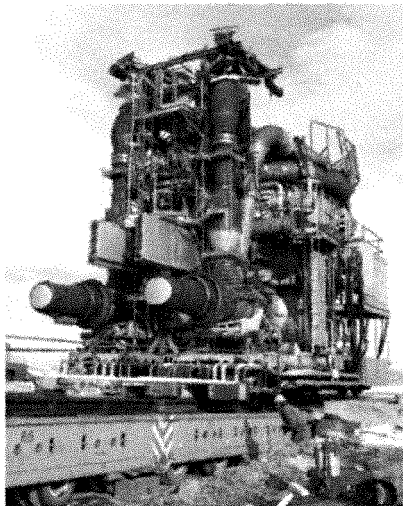
Generally includes all restrictions on activities or on access or exposure to land, groundwater, surface water and other areas or media. Some common examples of tools to implement institutional controls include restrictions on use or access, zoning and public advisories.

**Five-year Review** - Periodic reviews of the protectiveness of cleanup activities that are mandated by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The review is required at any site where the remedial action leaves hazardous substances on site.

## History

Because of its remoteness and distance from any major population base, 890 square miles of desert in eastern Idaho has been used by federal agencies to conduct various conventional weapons testing and nuclear research dating back to the 1940s. After World War II, the U.S. Navy and other military branches conducted ordnance testing, aerial bomb tests, and naval artillery testing at an area of the desert designated as the Naval Proving Grounds. In 1949, the

Atomic Energy Commission, a predecessor to the U.S. Department of Energy, created the National Reactor Testing station, which is now known as the INEEL. The primary mission at the time was to design, construct and test nuclear reactors for the purpose of generating electricity to power naval vessels and to conduct nuclear materials testing. More than 50 reactors have been built and tested in the past 50 years.



*Nuclear airplane engine*

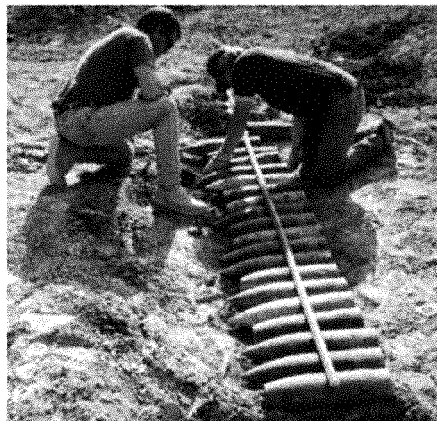
During the past five decades, these activities created waste by-products that were disposed at the INEEL using common techniques of the time, such as shallow burial, injection wells and unlined wastewater disposal ponds. Waste generated at a DOE facility in Colorado was disposed of at the INEEL. Hazardous and radioactive contaminants were also introduced into the environment from accidental spills, leaks and discharges.

The Environmental Restoration Program was established in 1989 to identify, assess and clean up contaminated areas that pose an unacceptable risk to people or the



*Historic method of barrel disposal*

environment. Since that time, the INEEL has removed thousands of unexploded ordnance devices, excavated and disposed of thousands of cubic yards of contaminated soil and debris, treated thousands of gallons of water, and placed protective covers over contaminated areas.



*Unexploded ordnance*

## Why Long-Term Stewardship ?

In 1989, the INEEL was added to the U.S. Environmental Protection Agency's Superfund National Priorities List, which requires investigation of all contaminated sites and cleanup of these sites, as necessary.

As cleanup projects are completed, there is a requirement to continue maintenance and monitoring to avoid any activity that could reduce the protectiveness of current barriers. The Long-Term



*Soil and vegetation monitoring*

Stewardship Program will ensure that clean-up remedies and institutional controls continue to protect people and the environment long after the INEEL has completed its cleanup mission. The LTS program will sustain information about what hazards remain, so that DOE can make informed decisions when considering future missions at the site. DOE will make sure the communities around the site have information about the risks remaining, and will continue to communicate with those communities while planning and doing stewardship activities.

### **Which documents contain information about Long-Term Stewardship?**

#### ***Department of Energy Long-Term Stewardship***

- A Report to Congress on Long-Term Stewardship, DOE/EM-0563, January 2001  
<http://its.apps.em.doe.gov/center/ndaareport.html>
- Long-Term Stewardship Study, DOE-EM-0605, October 2001  
<http://its.apps.em.doe.gov/center/stewstudy.html>

#### ***INEEL Long-Term Stewardship***

- INEEL Long-Term Stewardship Strategic Plan, DOE/ID-11008, Rev. 0, September 2002  
<http://www.inel.gov/environment/its-strat-pln-doe-id-11008-r0.pdf>
- INEEL Long-Term Stewardship Baseline Report and Transition Guidance, INEEL/EXT-01-01410, November 2001
- INEEL Long-Term Stewardship Public Involvement Plan, INEEL/EXT-01-01445, Rev. 0, October 2001
- Comprehensive Facility Land Use Plan, DOE/ID-10514, U.S. Department of Energy Idaho Operations Office (1998)  
<http://mceris/wag/>
- INEEL Long-Term Stewardship Implementation Plan (July 2003 Draft)

## What does the Long-Term Stewardship Program do ?

- Manages the natural environment
  - Surveys and monitors groundwater and soils
  - Manages the ecosystem (such as the Sagebrush Steppe Preserve)
  - Controls weeds
- Protects historic and cultural resources
  - Buildings and structures eligible for listing on the National Register of Historic Places
  - Resources of interest and value to the heritage of the Shoshone-Bannock Tribes
- Enforces institutional controls and places access control signs
- Operates long-term groundwater treatment processes
- Maintains barriers, caps, entombed building and containment structures
- Takes care of long-term record keeping and information management
- Prepares five-year reviews of cleanup sites as mandated by law
- Promotes stakeholder involvement and communication

## Summary

DOE will continue to maintain the safety and health of the public and the environment and continue to conserve the natural, ecological and cultural resources of the INEEL. Please take advantage of these involvement opportunities to learn more about the LTS program and provide us with your ideas for better stewardship and a better INEEL.



Resource study of INEEL cave

## Stakeholder Involvement Opportunities

The INEEL makes LTS information available to the public in several ways. These include:

- Briefings and discussions with stakeholders and Tribal governments
- A toll-free phone line (1-800-526-5620) that allows anyone to ask questions and request documents related to the INEEL LTS Program
- Distribution of fact sheets and brochures
- A mailing list of interested individuals is maintained for citizens who have expressed interest in receiving information related to LTS
- A World Wide Web site (<http://www.inel.gov>) that provides information on all aspects of the INEEL, including the LTS Program (<http://www.inel.gov/environment/ineel-lts.shtml>)
- Document reading rooms in Idaho Falls and Boise areas

## For More Information

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## **Appendix D**

### **Summary of Stakeholder Comments and Questions**





## **Appendix D**

### **Summary of Stakeholder Comments and Questions**

#### **D-1. SUMMARY OF STAKEHOLDER COMMENTS AND QUESTIONS**

##### **D-1.1 Shoshone-Bannock Tribes — 3/13/03**

1. How will future generations know of underground contamination if the land surface has been covered or remediated?
2. What is the relationship of NE to the INEEL and LTS? Will NE change the stewardship? Questions arose about what is meant by “accelerated cleanup,” whether the site is shutting down, what it means to have a new mission, and how the transition works.
3. How do we know we have an accurate understanding of what really went on at the facilities, what was really dumped and where, and if we are losing people all the time (through retirement, cutbacks, etc.)?

##### **D-1.2 High Country Resource Conservation and Development Board Meeting — 5/29/03**

1. Are the Idaho Nuclear Technology and Engineering Complex (INTEC) tanks irradiated?
2. How are the INTEC tanks neutralized?
3. Are the INTEC tanks stainless steel?
4. How much liquid have you lost?
5. Are you going to dig the tanks up and send them to the Waste Isolation Pilot Plant (WIPP)?
6. Discuss the rumors surrounding the SL1 accident, i.e., the buried ambulance and the “love triangle.”
7. How much ordnance is at the site?
8. Will you ever allow unlimited access to the INEEL?
9. Are the tribes allowed access? Which tribes?
10. Can you guarantee continued funding for the LTS program?

##### **D-1.3 Council of Mayors — 6/2/03**

1. Linda Milam commented that the counties surrounding the INEEL need to be interested in the long-term future of the INEEL.
2. Milam expressed concern about the “shrinking of the INEEL.”

3. The DOE needs to work with local agencies as land use plans are developed.
4. Someone asked: Is my confidence justified in assuming the DOE is taking good care of the site?
5. A number of individuals were interested in the site tours.
6. The DOE was admonished to keep communication open with surrounding communities.

#### **D-1.4 INEEL State Oversight Office — 6/5/03**

1. Is the LTS program connected with the integrated groundwater program?
2. Where will LTS end up with the split between NE and EM? Who's going to fund it?
3. Will LTS be an active participant in remediation decisions, or will it just passively receive information?
4. Will the LTS program participate in the feasibility study phase of the environmental restoration (ER) process?
5. Some of our former managers wanted a cumulative impact analysis for the INEEL. Do you think LTS is the place for that?
6. What is the policy on "*official use only*" information, and things like maps? Who decides this, and how is the release of information coordinated?
7. Is the INEEL ahead of the game with respect to LTS, compared to other DOE facilities?
8. What is the actual administrative procedure for LTS activities?
9. What are the procedures for emergency response at LTS sites?
10. How does this plan affect the risk-based end states for the INEEL?

#### **D-1.5 Butte County Commissioners — 6/9/03**

1. Discuss sagebrush steppe issues.
2. Do you have a relationship with the Arco publisher/editor of the Advertiser? (This was discussed in the context of communicating with Arco residents.)
3. In reference to the photo of the drums being dumped into the pit, the question was asked: How good were records kept for this kind of activity?
4. How broad is your LTS committee? What resources do you have? Is it both DOE and contractor resources?
5. Does the local community have access to the process of LTS?
6. Will LTS be involved in allowing the hunting of migrating animals on the INEEL?

### **D-1.6 Idaho Fish and Game — 6/11/03**

1. What role do you see us playing in your LTS program?
2. Would we be on some interdisciplinary council?
3. What is the timeline for the review of the implementation plan?
4. Are site tours available?
5. What kind of LTS working committees are there?
6. Any interagency committees? It would be good to consider what agencies would be needed and what disciplines would be useful.
7. Some kind of interagency liaison is needed.

### **D-1.7 Coalition 21 — 6/13/03**

1. How long will the organic contamination in the vadose zone (OCVZ) units operate?
2. How long will the Test Area North (TAN) pump and treat units operate?
3. How does the LTS program tie into the decommissioning, decontamination, and dismantlement (DD&D) of facilities? Does LTS have anything to do with the facilities in use? Is LTS involved only with facilities or buildings no longer in use? What about the tank farm?
4. How clean does it need to be to be clean? How contaminated does it need to be to be contaminated? Some assume that the site will be free released. Is this no longer the case?
5. Is it true that as soon as the INEEL gets turned over to another organization, then LTS stops?
6. There was some talk about some of the land being turned over to the public. Is this true?
7. Has the change from EM to NE made major changes in your direction? How will this change impact stewardship?
8. As you go forward and think about new facilities, what would make your successor's job easier?
9. Are you saying you will not produce any more waste?
10. The Process Experimental Pilot Plant (PREPP) and the situation of how it was not finished was mentioned. It makes them a little nervous.
11. Has anyone attempted to compare the different sources of fuel, for example, coal, hydro, nuclear, oil? Coal and oil produce a lot of waste that goes to the atmosphere.
12. There was a meeting earlier in the week on the *Environmental Munugement Performance Munugement Plan* (DOE-ID 2002b) Did anyone attend?
13. Getting information is difficult. More communication with the public is needed!

14. What would make your successors' jobs easier 50 years in the future?

### **D-1.8 Jackson City Council — 6/16/03**

1. Do you have any monitors at the bottom of the Waste Calcining Facility?
2. What is an experimental breeder reactor?
3. What are you doing to take care of the old plumbing at the INTEC tank farm?
4. How does the LTS program work with the removal of transuranic (TRU) waste? Concern was expressed about how waste area groups (WAGs) select remedy options and the long-term impact of those options.
5. Disappointment was expressed at the closing of the INEEL office in Jackson.
6. What is the current thinking on the long-term future of the INEEL?
7. The big issue is the INTEC tank farm plumbing.

### **D-1.9 Citizens Advisory Board LTS Subcommittee Conference Call — 6/18/03**

1. The subcommittee wanted an overview of the LTS schedule.
2. It may be difficult to provide comments because of the INEEL review process. (Recommended scheduling a discussion of the INEEL document review process for the next Citizens Advisory Board meeting.)
3. When is the last day for the review?

### **D-1.10 Snake River Alliance Conference Call — 6/18/03**

1. Do you have the sites identified where you will have residual contamination? Do you have a list of the specific sites? Can we get a copy of those sites? Why won't they be in this document (LTS Implementation Plan)?
2. Do you monitor outside the site boundaries, for example, in the Magic Valley area?
3. Do you depend on an electronic record keeping system? Are you looking at that?
4. How is LTS going to relate to the new reactor?
5. Have you gotten any feedback on the definition of LTS? The New Waste Policy Act (NWPA) requires that all high-level waste be disposed of in a geologic repository. Will any high-level waste be left after cleanup is done?
6. People don't have a good overview of everything going on at the site. How can someone like me find out about LTS as a whole? How can we develop a good understanding?

7. Is the groundwater monitored just within the INEEL boundaries? Will groundwater be monitored as long as there are LTS areas? Is BBWI doing all the monitoring at LTS sites?
8. How long do you have to keep LTS records?
9. How will LTS records transfer to the new contractor?
10. Can you send a hard copy of the LTS Implementation Plan to each of the offices?
11. How is LTS going to handle the nuclear waste from a new power plant?
12. Can we comment on the definition of LTS?
13. Comment concerning the NWPA: INEEL cannot leave any high-level waste on the site.
14. What specifically does LTS mean? How many DOE sites will need LTS?
15. How often do you survey and monitor?
16. Is there a way to look at LTS as a whole to understand how it fits together?
17. Are there plans to release any site areas to the public in the future?
18. How can we be sure there will be funding to do this work? Can you really be sure you will have funding?
19. Historically there has not been a lot of trust between the public and the DOE. You have a real problem with public trust. The public has not always been informed.
20. Most DOE documents are not easily readable. Are you going to include a "lay" person to review this document? You need to summarize for the public what the document actually means. You'll never gain the public's trust without understandable documents.
21. The INEEL used to be the lead for cleanup development. This technical "know how" seems to have disappeared. We don't think you can maintain that status without an adequate research and development (R&D) program.
22. Is there a timeline for getting comments back on the Implementation Plan? Will you have a workshop or public meeting to discuss comments?

### **D-1.11 Citizens Advisory Board Meeting — 7/15/03**

1. Some of the strategic objectives say that things will be done and others state that things could be done. Is this really what you want to say?
2. When does LTS begin with respect to completion of a remedy? The board liked the reference to end state. What does "current position" mean?
3. Is the land management plan the same thing as the comprehensive facility and land use plan (CFLUP)?

4. Are you interested in cultural and natural resources in contaminated areas or the whole site?
5. How will things be handed off from EM to NE? Will the hand-off be after cleanup is complete? Will NE accept things “as is”? What is the expectation of how smooth the transition will be?
6. Who will own LTS from 2012 to 2035?
7. The strategic objectives seem so broad. Identifying performance measures may be difficult.
8. The Bureau of Land Management (BLM) or others may have natural resources plans. Does INEEL have a land management plan? Is DOE responsible for preparing a land management plan?
9. Will EM really own environmental cleanup until 2035?
10. How will the strategic objectives be enforced?
11. What happens if there is no funding for LTS?
12. The language in strategic objective 5.1 is discouraging because there doesn’t appear to be much commitment to incorporate LTS needs into procedures.

### **D-1.12 Arco City Council Meeting — 7/28/03**

1. Have you established a way to determine where contamination is left in place?
2. Have you established a baseline for the groundwater and the subsequent monitoring?
3. Are you also monitoring surface contamination?
4. There is a concern that during a fire, contamination could become airborne.
5. Could the surface areas that have contamination be capped with gravel?

**Appendix E**  
**List of Public Comments**





## Appendix E

### Public Comments on the Draft LTS Implementation Plan

Comment Number	Comment
1	The INEEL CAB recommends the incorporation of measurable performance objectives into the Long-Term Stewardship Program
2	What level of consultation will DOE-ID conduct with the Shoshone-Bannock Tribes? Before DOE-ID makes any final decisions regarding land use on the INEEL, it must conduct high-level consultation with the Tribes. Government-to-Government consultation will more than likely be required, Section 3.D. of the AIP.
3	Section 5.1.1. Paragraph that begins with “Management systems at the INEEL...”), 4th sentence. The INEEL Architectural Properties Management Plan and the INEEL Cultural Resource Management Plan (APMP) are both draft documents. They should be noted as such. In addition, the Programmatic Agreement is not final and has not been signed by the SHPO and Advisory Council. This sentence should state that DOE-ID is in the process of getting the APMP and PA finalized. This change should also be made on page 12, regarding these documents.
4	Section 5.1.3, 1st paragraph under status. I’m sure that the INEEL did not identify about 100bird, 70 mammal, and 23 amphibian and reptile species in the Great Basin, which is a great expanse that includes the INEEL. The number of species was probably identified by some other Federal agency, like the USFWS or BLM. Suggest that this sentence be revised to accurately reflect the relationship between the INEEL and the Great Basin. In any case, it would be helpful to mention or describe the Great Basin area and how the INEEL fits into it. Although there are currently no Threatened or Endangered species on the INEEL, it should be noted that there are efforts by conservation groups to list the Sage Grouse on the Tand E species list. If this happens, it will have an impact on how the Sagebrush Steppe reserve is managed.
5	Section 5.1.3. Begins with “In 1999, a portion...”. Suggest replacing “a portion” with “approximately 73,263 acres”
6	Section 5.1.3, Change the DOE-ID cultural research coordinator to the DOE-ID Cultural Resources Coordinator.
7	Future Implementation Opportunities. The long-term stewardship program will develop a cultural resource surveillance and monitoring plan. What does this mean? What personnel make up the LTS program? Will a member of the DOE-ID M&O contractor’s Cultural Resource Management Office (CRMO) be part of the LTS program, or will the cultural resources work be contracted out to a sub-contractor or another Federal agency? If the CRMO is not part of the LTS program, then a member of the CRMO should provide input to the plan with concurrence by the DOE-ID cultural resources coordinator. I recommend that a member(s) of contractor CRMO be part of the LTS program or offer input into the plan. Whoever develops the plan will need to consult with the Idaho SHPO and the Tribes.

8	Consider adding a Performance Objective to eliminate conversion of sagebrush steppe ecosystem to a non-native invasive plant community
9	Develop a baseline invasive plant species map as part of the ecological resource management plan to implement the previous suggestion.
10	Reduce number and size of invasive plant species infestations on the INEEL when compared to baseline invasive plant species map to implement the suggestion in comment 8.
11	<p>The fact that the government finds it necessary to even put this question before the public makes me extremely suspicious. There should be no question about the government's responsibility to insure that "cleanup measures remain protective of human health and the environment" . . . but, in my opinion, your track record to this point remains less than stellar.</p> <p>Your most recent attempt to reclassify the existing radioactive wastes and ultimately allow them to remain buried, posing a potential future disaster in contaminating the Snake River aquifer, is but an example of your past "stewardship". You should be setting a defining example as a responsible landlord so that if/when these lands are abandoned or returned to the State of Idaho, there is no question about future generations suffering from your intentions. Expedient solutions, shaped to satisfy current industry greed, should not be a consideration . . . regardless of the cleanup cost!</p>
12	The Department of Energy should select remedies that protect the long-term safety and health of the community and of the environment surrounding the Idaho National Engineering Laboratory and other DOE facility.
13	The DOE should consider all aspects of establishing, maintaining and ending long-term stewardship activities during the remedy selection process.
14	The DOE should compare the costs of immediate cleanup with those of long-term monitoring and maintenance through independent cost-benefit analysis.
15	The DOE should clean up facilities to a level that allows unrestricted use and avoids the need for LTS whenever possible.
16	The DOE should immediately explain the relationship between its LTS plans and its risk-based end states initiative.
17	Where full cleanup to unrestricted use is not practical due to current technical constraints, the DOE should include details of a complete protection plan in remedy decision documents.
18	The DOE must aggressively pursue new clean-up technologies for sites where contaminants are slated to remain in place.
19	The DOE should fully characterize, disclose, and document the location of all residual contamination and make those records readily accessible to the public, for instance by placing complete records of contaminants on file with regional libraries and state archives.
20	The DOE should compensate local governments for the costs of emergency response staff, training, protective equipment, and retention of information about the nature of remaining contaminants.

21	The DOE should adopt financial assurance mechanisms to ensure adequate funding for long-term environmental protection.
22	The DOE should design contingency plans at the time cleanup decisions are made.
23	What does it mean that the Old Waste Calciner becomes a long-term stewardship responsibility after it receives its post-closure permit? For instance, what effect will it have on establishing the baseline and monitoring for contaminants in the perched water? What will be LTS's relationship with Idaho's Department of Environmental Quality? Will the records be in the CERCLA-mandated administrative record?
24	Why aren't RCRA sites and facilities included in the Comprehensive Facility and Land Use Plan? Is it still accurate that the CFLUP will be available on the INEEL web page? What are the differences between the publicly available CFLUP and the controlled version?
25	The Alliance strongly urges a well-thought-out and aggressive communication plan for the comprehensive five-year remedy review process. The Alliance volunteers to help design such a plan.
26	5.3.1 This draft rightly acknowledges that electronic document management systems are "vulnerable to outdated technology." We commend LTS's intention to design an information management plan that includes data migration strategies. We further encourage LTS to maintain the information on acid-free paper.
27	What does "environmental management style" (23) mean?
28	We are concerned by the frequent references to and acceptance of funding and resource limits and uncertainties. Long-term stewardship of the risks caused by nuclear weapons production is the quintessential federal responsibility. What kind of "outsourcing of long-term stewardship activities" is contemplated?